

EPA Reg. No. 91889-3

PROCESSING REQUEST

Reg # 91889-3

Decision # 528935

Description: New Registration

Electronic Label & Letter
(see PPLS):

OR

Non Electronic
Label & Letter
(Scanning required):

☒ Dated: 09/12/17

☐ Dated:

Only one label type should be selected

Other Materials Sent (see jacket):

☒ New CSF(s) Dated: 04/21/17

☐ Other:

File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.

Reviewer: Mengou Adams

Division: BPPD

Phone: 703-347-8496

Date: 09/12/17



U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Biopesticides and Pollution Prevention Division (7511P)
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460

EPA Reg. Number:

91889-3

Date of Issuance:

9/12/2017

NOTICE OF PESTICIDE:

☒ Registration
☐ Reregistration
(under FIFRA, as amended)

Term of Issuance:

Unconditional

Name of Pesticide Product:

Entomol 15% Liquid

Name and Address of Registrant (include ZIP Code):

Entomol Products, LLC
40 Gold Street
San Francisco, CA 94133

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Biopesticides and Pollution Prevention Division prior to use of the label in commerce. In any correspondence on this product, always refer to the above EPA Registration Number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA or the Act).

Registration is in no way to be construed as an endorsement or recommendation of this product by the U.S. Environmental Protection Agency (EPA). In order to protect health and the environment, the Administrator, on his or her motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under the Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is unconditionally registered in accordance with FIFRA section 3(c)(5) provided that you:

1. Submit and/or cite all data required for registration or registration review of your product when the EPA requires all registrants of similar products to submit such data.
2. Make the following labeling change before you release this product for shipment:
 - Revise the EPA Registration Number to read, "EPA Reg. No. 91889-3."

Signature of Approving Official:

Andrew Bryceland, Team Leader
Biochemical Pesticides Branch
Biopesticides and Pollution Prevention Division (7511P)
Office of Pesticide Programs

Date:

9/12/2017

3. Submit one (1) copy of the final printed labeling for the record before you release this product for shipment.

Should you wish to add/retain a reference to your company's website on your label, then please be aware that the website becomes labeling under FIFRA and is subject to review by the EPA. If the website is false or misleading, the product will be considered to be misbranded and sale or distribution of the product is unlawful under FIFRA section 12(a)(1)(E). 40 CFR § 156.10(a)(5) lists examples of statements the EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the EPA find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA-approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance.

Your release for shipment of this product constitutes acceptance of these terms. If these terms are not complied with, this registration will be subject to cancellation in accordance with FIFRA section 6. A stamped copy of the labeling is enclosed for your records. Please also note that the record for this product currently contains the following acceptable Confidential Statement of Formula (CSF):

- Basic CSF dated 04/21/2017

Any CSFs other than those listed above are superseded.

If you have any questions, please contact Menyon Adams of my team by phone at (703) 347-8496 or via email at adams.menyon@epa.gov.

Sincerely,

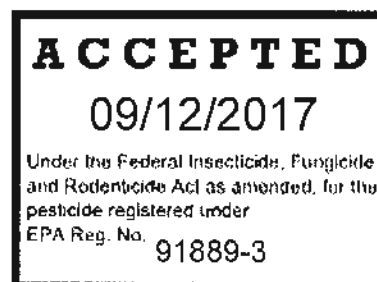


Andrew Bryceland, Team Leader
Biochemical Pesticides Branch
Biopesticides and Pollution
Prevention Division (7511P)
Office of Pesticide Programs

Enclosure

() – Denotes optional label language
{ } – Denotes a comment for the reviewer

Entomol 15% Liquid
(Insect repellent)(Liquid)
(Repels Mosquitoes and Blackflies)
(Insect Repellent Pump-Spray)



ACTIVE INGREDIENT:

Refined Oil of *Nepeta cataria*..... 15.0%

OTHER INGREDIENTS 85.0%

TOTAL: **100.0%**

KEEP OUT OF REACH OF CHILDREN

WARNING

(See (Back) (or) (Side) (Label Panel(s)) (Product Leaflet) for Additional
Precautionary Statements)

FIRST AID	
If in Eyes:	<ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after 5 minutes, then continue rinsing eye.• Call a Poison Control Center or doctor for further treatment advice.
If swallowed:	<ul style="list-style-type: none">• Call Poison Control Center or doctor immediately for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by the poison control center or doctor.• Do not give anything by mouth to an unconscious person.
HOTLINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For emergency information on this pesticide product (including health concerns, medical emergencies, or pesticide incidents), call the poison control center at 1-800-222-1222. For non-emergency information concerning this product, call the National Pesticides Information Center (NPIC) at 1-800-858-7378 (NPIC Web site: www.npic.orst.edu)	

EPA Reg. No. 91889-NEW
EPA Est. No. XXXXX-YY-ZZZ

NET CONTENTS:
BATCH NO.:

Manufactured By:
Entomol Products, LLC
40 Gold Street
San Francisco, CA 94133

Label Version: 4/21/2017

Page 1 of 6

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PRECAUTIONARY STATEMENTS

HAZARD TO HUMANS AND DOMESTIC ANIMALS. WARNING. Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

PHYSICAL AND CHEMICAL HAZARDS

FLAMMABLE: Keep away from Heat and Open Flame.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Repellency – Repels mosquitoes and blackflies for up to 7 hours.

Do not allow children to handle the product or apply it to themselves. If used on the face, spray/dispense on hands first and then apply sparingly and avoid eyes. Do not spray directly onto face.

Dispense/Spray apply a small amount of liquid directly onto skin. Spread uniformly to completely cover any exposed skin surface. Use sparingly on face and avoid contact with eyes. Reapply after 4-6 hours (or as needed).

When applying to children, dispense into an adult's hand and then spread evenly and completely over the child's exposed skin taking care not to contact the child's fingers and hands. Do not apply over cuts or damaged skin. When applying to children, dispense into an adults hand and then spread evenly and completely over the child's exposed skin taking care not to contact the child's fingers and hands.

Do not apply over cuts or damaged skin. After returning indoors, wash treated skin with soap and water or bathe. Also wash clothing before wearing it again.

STORAGE AND DISPOSAL

Do not contaminate water or food by storage or disposal.

PESTICIDE STORAGE: Store away from children.

PESTICIDE DISPOSAL: Do not contaminate water, food or feed by storage or disposal. Never place unused product down any indoor or outdoor drain.

CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. If empty: Offer for recycling if available or discard in a sanitary landfill. If partly filled: Call your local solid waste agency for disposal instructions.

- () – Denotes optional label language
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{NOTE TO REVIEWER: All claims in this section are optional}

- Mosquito repellent
- Blackfly repellent
- Repels mosquitoes
- Repels blackflies
- Effective protection from mosquitoes, blackflies
- Effectively repels mosquitoes and blackflies
- (Effective) protection (from a range of mosquitoes and blackflies)
- Repels mosquitoes that may carry (West Nile Virus) (and) (Eastern Equine Encephalitis)
- Works great on blackflies
- Protection (from bites) from blackflies (for the whole family)
- Protection for people on the go
- Protection that fits your lifestyle
- Protects from mosquitoes (and) (blackflies) (for up to 7 hours)
- Apply every 6 hours (or as needed)
- Repels mosquitoes and blackflies (for up to 7 hours)
- (Smart) Outdoor protection (from annoying) (mosquitoes) (and) (blackflies) (for up to 7 hours)
- Repels flies (too!)
- Keeps (mosquitoes) (and) (blackflies) off (your family)
- Guards the whole family (safely)
- Protection that fits your (active) lifestyle
- Protect(s) your family at dusk and dawn
- An effective insect repellent
- Protection during outdoor activities
- (Sport) (Active) (Outdoor) formula
- Outdoor mosquito and blackfly protection for play and on the go
- For yardwork and camping
- Protects during work, play or recreation
- Contains (a) plant-based repellent
- Plant based repellent that repels (mosquitoes) (and) (blackflies) (for) (up to 7 hours)
- Contains plant extracts
- Contains the insect repellent found in (catmint) (catnip) (oil)
- (Plant based) (insect repellent without trade offs)
- Always carry (product name)
- For playing and relaxing outdoors
- Not oily, greasy or sticky
- No added fragrance
- Contains no dyes (or added fragrances)
- No chemical odor
- No synthetic odor
- No unpleasant odor
- Leaves pleasant feeling on skin

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- Won't stain
- (Readily) (Easily) washed off
- Won't harm plastics
- Specially formulated to (feel) (and) (smell) better on your skin
- (light) (gentle) (clean) (mild) (smooth) (non-greasy) (pleasant) (feels great) (comfortable) formula
- No residue on skin
- (It's) pleasant smelling
- Feels comfortable (to touch)
- DEET free
- Non DEET
- Non synthetic
- Readily washed off
- New!
- Repels (mosquitoes) (and) (blackflies)
- Repels mosquitoes that may carry (West Nile) (St. Louis) (Eastern equine) (Western equine) (LaCrosse) (Cache Valley) encephalitis (for up to 7 hours)
- Provides protection from mosquitoes
- Up to 7 hour mosquito and blackfly repellent
- Up to 7 hour protection
- Up to 7 hours of (effective) mosquito (and) (blackfly) protection
- Up to 7 hours of protection from mosquitoes. (Also) (protects against) (works on) (repels) (blackflies)
- Protects for up to 7 hours against (mosquitoes) (and blackflies)
- (Protects against) (Fights off) (Repels) (Works on) (mosquitoes) (and) (blackflies)
- Protects against mosquitoes (and) (blackflies)
- Long-lasting protection against (mosquitoes) (and blackflies)
- Effective protection from mosquitoes
- Effective protection from blackflies
- Stay protected for up to 7 hours (from) (mosquitoes) (and) (blackflies)
- Stay protected for up to 7 hours from mosquitoes that may carry (West Nile Virus) (St. Louis) (Eastern equine) (Western equine) (LaCrosse) (Cache Valley) encephalitis
- Proven protection from mosquitoes
- Up to 7 hour insect repellent
- Up to 7 hour protection
- (Up to) 7 hours of (effective) mosquito protection
- (Up to) 7 hours of protection from mosquitoes. Also (protects against) (works on) (repels) (blackflies)
- Protects for (up to) 7 hours against (mosquitoes)(,) (and) (blackflies)
- (Protects against) (Fights off) (Repels) (Works on) (mosquitoes)(,) (and) (blackflies)
- Protects against mosquitoes and (blackflies)
- Long-lasting protection against (mosquitoes)(,) (and) (blackflies)

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- Effective protection from mosquitoes
- Effective protection from blackflies
- Stay protected for up to 7 hours (from) (mosquitoes)(,) (and) (blackflies)
- Stay protected for up to 7 hours from mosquitoes that may carry (West Nile) (St. Louis) (Eastern equine) (Western equine) (LaCrosse) (Cache Valley) encephalitis
- Proven protection from mosquitoes
- Mosquito protection (for up to 7 hours)
- Biting (mosquito) (and) (blackfly) protection that you can feel confident will last up to 7 hours.
- Repels mosquitoes (for up to 7 hours)
- Repels blackflies (for up to 7 hours)
- Easy to (Use) (Apply)
- For (hiking) (fishing) (hunting) (camping) (backpacking)
- Relax and enjoy the (outdoors)(,) (the great outdoors)(,) (backyard)(,) (outside)(,) (park)(,) (woods/forest) with up to 7 hours of protection against (mosquitoes) (and) (blackflies)
- Portable repellent protection
- Comfortable feel with no chemical (odor)(smell)
- Comfortable feel with pleasant smell
- Long-lasting
- Contains Refined Oil of *Nepeta cataria*
- Essential oil based repellent, not a synthetic chemical.
- Plant based essential oil insect repellent.
- Essential oil insect repellent with up to 7 hours of effective protection (against) (mosquitoes) (and) (blackflies)
- Insect repellent with up to 7 hours of effective protection (against mosquitoes) and (blackflies)
- An essential oil repellent that protects against mosquitoes that may carry West Nile Virus
- Repels mosquitoes that may carry West Nile Virus and Encephalitis
- Effective mosquito repellent
- Repels mosquitoes for up to 7 hours, which may carry West Nile Virus and Encephalitis
- Plant based, essential oil that repels mosquitoes for up to 7 hours
- A plant based insect repellent with up to 7 hours of effective protection
- Good for people
- Protects people
- Produced from a renewable resource

(LIMITATION OF WARRANTY AND LIABILITY)

(NOTICE: Read this Limitation of Warranty and Liability Before Buying or Using This Product. Entomol Products, LLC will not be responsible for losses or damages resulting from the use of this product in any manner not specifically directed by Entomol Products, LLC.

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User assumes all risks associated with such non-directed use. If the Terms Are Not Acceptable, Return the Product at Once, Unopened, and the Purchase Price Will Be Refunded.

It is impossible to eliminate all risks associated with the use of this product. Such risks arise from weather conditions, presence of other materials, the manner of use or application, or other unknown factors, all of which are beyond the control of Entomol Products, LLC. These risks can cause: ineffectiveness of the product. **WHEN YOU BUY OR USE THIS PRODUCT, YOU AGREE TO ACCEPT THESE RISKS.**

Entomol Products, LLC warrants that this product conforms to the chemical description on the label thereof and is reasonably fit for the purpose stated in the Directions for Use, subject to the inherent risks described above, when used in accordance with the Directions for Use under normal conditions.)

(TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ENTOMOL, LLC MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF FITNESS OR OF MERCHANTABILITY OR ANY OTHER EXPRESS OR IMPLIED WARRANTY. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, IN NO EVENT SHALL ENTOMOL PRODUCTS, LLC OR SELLER BE LIABLE FOR ANY INCIDENTAL, CONSEQUENTIAL OR SPECIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT. BUYER'S OR USER'S BARGAINED-FOR EXPECTATION IS INSECT REPELLING. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER AND THE EXCLUSIVE LIABILITY OF ENTOMOL, LLC OR SELLER, FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY OR CONTRACT, NEGLIGENCE, TORT OR STRICT LIABILITY), WHETHER FROM FAILURE TO PERFORM OR INJURY TO OTHER, AND RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT, OR AT THE ELECTION OF ENTOMOL PRODUCTS, LLC OR SELLER, THE REPLACEMENT OF THE PRODUCT.

To the extent consistent with applicable law that allows such requirement, Entomol Products, LLC or its Ag Retailer must have prompt notice of any claim so that an immediate inspection of buyer's or user's can be made. Buyer and all users shall promptly notify Entomol Products, LLC or its Ag Retailer of any claims, whether based on contract, negligence, strict liability, other tort or otherwise, or be barred from any remedy. This Limitation of Warranty and Liability may not be amended by any oral or written agreement.)

BPPD Old Active Ingredient Checklist

New Product Registration/Existing Product Amendment

Fast Track ☐ PRIA Actions B650 ☐ B660 ☒ B670 ☐ B680 ☐ B71 ☐ B720 ☐ B730 ☐ B880 ☐ & B900 ☐

EPA Reg. No.: 91881-E RAL: mclains Application Date: 6/1/2017

x	Check list Item	Yes	No
1.	Application Form (EPA Form 8570-1) - signed & complete including package type? IF NO, STOP! Call applicant and have them correct application and resubmit.	X	
2.	If amendment, was final printed labeling received for previous action? IF NO, STOP! E-mail applicant and request final printed labeling.		
3.	Confidential Statement of Formula (CSF) EPA Form 8570-4 Basic Formula x Alternate Formula(s) <input type="checkbox"/>		
a.	CSF Review completed? IF YES, SKIP to ITEM 4.	X	
b.	CSF is signed and dated? IF NO, CALL APPLICANT.	X	
c.	Completely filled out: CAS numbers, pH, flashpoint, flammability, if applicable?	X	
d.	Are the totals accurate?	X	
e.	Certified limits agree with 40 CFR 158.175? Note that if preliminary or 5 batch analysis differ from Section 158.175(b), limits based on batch analysis would need to be proposed under Section 158.175(c).	X	
f.	Viability (if live microbial, i.e., cfu/gram)? NA <input checked="" type="checkbox"/>		
g.	PC codes assigned on CSF for actives & inerts plus 40 CFR 180.910, 180.920, and 180.930 codes noted for products that have food or feed uses?	X	
h.	List 1 inert ingredient(s) present in the formulation? If YES, be sure it is listed on the label.		
i.	Alternate formula(s) do not require different labeling from basic CSF or other alternate CSFs per 40 CFR 152.43(b)(3). NA <input checked="" type="checkbox"/>		X
j.	Source for a.i. is a registered pesticide? (When a proposed alternate or new basic formula involves a new registered manufacturing-use product as the active ingredient source it must be determined whether the manufacturing-use products used to formulate are similar enough to warrant use of existing product specific data such as acute toxicity.)	X	
k.	Does CSF list peanuts, tree nuts, milk, soybeans, eggs (including putrescent eggs), fish, crustacea, or wheat commodities? IF YES, RAL must evaluate label directions for compliance with 40 CFR 180.1071.		X
4.	Data and Data Matrix present. (EPA Form 8570-35)	X	
a.	a) Using Selective Method? [IF NO, SKIP to ITEM 5 since data matrix required for selective method.]		X
b.	Complete Data Matrix supporting both the product registration and, if applicable, the proposed amendment. Minimum Data Matrix for registration includes: product specific acute toxicity, product chemistry, and efficacy data for public health pests claimed on label.		
c.	Adequate product specific data submitted?		
d.	Registered source used for active ingredient? IF YES, SKIP to ITEM 5. (If active ingredient is from a registered source (manufacturing-use product), generic data should be satisfied by registered source.) IF NO or if use not supported by registered source, generic data is necessary.		
e.	Data passed PR Notice 86-5 for formatting and MRID number assignment?		
f.	Public copy of Data Matrix provided? (PRN 98-5)		
5.	Certification with Respect to Citation of Data (EPA Form 8570-34): See 40 CFR 152.80-98 and PR Notice 98-5 [Note: If no data are required or submitted, form is not needed. This is often true for minor amendments.]		
a.	Did applicant check a Method of Support?	X	
b.	General Offer to Pay checked for Cite-all Method or Cite-all under Selective Method?	X	
c.	Is the form signed and dated?	X	
d.	Check form and Data Matrix; are Exclusive Use data cited from other sources?		X
e.	IF YES, is the required authorization letter included in application?		
6.	Formulators Exemption (EPA Form 5870-27)		
a.	If registrant is using a registered source active ingredient in the formulation (manufacturing-use product), is form filled out completely and signed? NA <input type="checkbox"/>	X	

#	Check list Item	Yes	No
7.	Exclusive Use Notice Required Prior to Registration (Required per 40 CFR 152.116, separate from permission of an exclusive use data submitter to rely on exclusive use data) Is this an exclusive use active ingredient or mix of active ingredients (registered w/in last 10 yrs)? If YES, go to a) or b) below.		
a.	a) Has a notification of intent to register letter or email been sent to the exclusive use data submitter(s) at least 30 days before registration? (This notification is required for all methods of data support except when the exclusive use data submitter(s)' product is used to formulate and the formulator's exemption is claimed.)		
b.	Has exclusive use data submitter requested during 30 day period the applicants' list of data requirements and method of compliance?		
c.	Has registrant submitted certification from exclusive use data submitter that submitter is aware of the application and does not object to the registration?		
8.	Science Review completed? Comments:	X	
9.	Label(s) Review X Date of Label Review: 09/01/17 Mary Adams		
a.	Label(s) in conformance with current <i>Label Review Manual</i> and appropriate REDS.	X	
b.	Labeling statements and claims are supported by Acute Toxicity, Product Chemistry data (or acceptable waivers). Acceptable efficacy studies support public health pests claimed on label.	X	
c.	Nominal concentration of active ingredient shown in ingredients statement.	X	
d.	Viability included as sub-statement of Ingredient Statement (if live microbial, i.e., cfu/gram).	NA	
e.	Storage and disposal instructions agree with container types listed on application form.	✓	
f.	Unique Product Name for Same Company (Check OPPIN).	✓	
g.	Does CSF list peanuts, tree nuts, milk, soybeans, eggs (including putrescent eggs), fish, crustacea, or wheat commodities? If YES , RAL must evaluate label use directions for compliance with 40 CFR 180.1071.		✓
h.	Does label bear "National Organic Program" (PR Notice 2003-1) or OMRI claims? If YES, National Organic Program or OMRI claims approved by Chris Pfeifer? <input type="checkbox"/>	NA	✓
i.	Labeling is acceptable. Corrections or changes are NOT necessary.	✓	
j.	Are DERs attached?		✓
k.	Comments:		

Adams, Menyon

From: Gonzales, Angela
Sent: Wednesday, August 16, 2017 9:52 AM
To: Adams, Menyon
Subject: RE: File symbol # 91889-G (Entomol 15% Liquid)

The basic formulation CSF is acceptable, the CAS number for the active ingredient has been added as requested.

Angela L. Gonzales, Biologist
U.S. Environmental Protection Agency
Biopesticides and Pollution Prevention Division (7511P)
1200 Pennsylvania Ave, NW
Washington, DC 20460
gonzales.angela@epa.gov
703-308-0460

From: Adams, Menyon
Sent: Wednesday, August 16, 2017 9:14 AM
To: Gonzales, Angela <Gonzales.Angela@epa.gov>
Subject: FW: File symbol # 91889-G (Entomol 15% Liquid)

Good Morning,

Here is the revised CSF for the subject action.

Best Regards,

Menyon Adams, Biologist
U.S. Environmental Protection Agency
Office of Pesticide Programs (7511P)
Biopesticides and Pollution Prevention Division (BPPD)
Biochemical Pesticides Branch (BPB)
adams.menyon@epa.gov
703-347-8496 (office)
703-305-0188 (fax)

From: Christopher Kampmeyer [<mailto:ckampmeyer@exponent.com>]
Sent: Tuesday, August 15, 2017 5:22 PM
To: Adams, Menyon <Adams.Menyon@epa.gov>
Cc: James Messina <jmessina@exponent.com>; Matthew Feinberg <mfeinberg@exponent.com>
Subject: File symbol # 91889-G (Entomol 15% Liquid)

Hi Menyon,

I am writing with regard to the revised CSF as mentioned below. Please find PDF copies of the basic and alternate CSFs, revised to include the CAS number for the active ingredient, attached.

Thank you,
Chris

Christopher Kampmeyer
Scientist
Exponent
1150 Connecticut Ave., NW
Suite 1100
Washington, DC 20036
Direct +1-202-772-4917 • Email ckampmeyer@exponent.com
www.exponent.com



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From: Adams, Menyon [<mailto:Adams.Menyon@epa.gov>]
Sent: Tuesday, August 15, 2017 1:29 PM
To: Matthew Feinberg
Subject: File symbol # 91889-G (Entomol 15% Liquid)

Hi Matthew,

Please make the following correction to the CSF. Send me the amended CSF upon completion.

1. The product chemistry submission is ACCEPTABLE, pending revision of the minor CSF deficiency identified below.
 - a. The Chemical Abstract Service (CAS) number for the active ingredient must be included in box 10 on the CSF.

Best Regards,

Menyon Adams, Biologist
U.S. Environmental Protection Agency
Office of Pesticide Programs (7511P)
Biopesticides and Pollution Prevention Division (BPPD)
Biochemical Pesticides Branch (BPB)
adams.menyon@epa.gov
703-347-8496 (office)
703-305-0188 (fax)

Refined oil of *Nepeta cataria*
PC Code: 004801
Type of Review: Product Chemistry, Human Health

DP Number: 440251
EPA File Symbol No.: 91889-G



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

MEMORANDUM

DATE: August 15, 2017

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

SUBJECT: Science Review in Support of the Registration of Entomol 15% Liquid, containing 15.0% Refined Oil of *Nepeta Cataria* as its Active Ingredient.

Decision Number:	528935
DP Number:	440251
EPA File Symbol Number:	91889-G
Chemical Class:	Biochemical
PC Code:	004801
CAS Number:	952722-18-8
Active Ingredient Tolerance/Exemption:	Nonfood-use
MRID Numbers:	None
PRIA Code:	B660

FROM: Angela L. Gonzales, Biologist /s/
Biochemical Pesticides Branch
Biopesticides & Pollution Prevention Division (7511P)

THROUGH: Russell S. Jones, PhD, Senior Scientist /s/
Biochemical Pesticides Branch
Biopesticides & Pollution Prevention Division (7511P)

TO: Menyon Adams, Regulatory Action Leader
Biochemical Pesticides Branch
Biopesticides & Pollution Prevention Division (7511P)

ACTION REQUESTED

On behalf of Entomol Products, LLC, Exponent, Inc. requests registration of Entomol 15% Liquid, a dermally-applied end-use product (EP) used to repel mosquitos and black flies. In support of the registration, the applicant has submitted a proposed product label, a Confidential Statement of Formula (CSF) dated 04-21-2017 and a data matrix dated 04-21-2017.

RECOMMENDATIONS AND CONCLUSIONS

1. The product chemistry submission is ACCEPTABLE, pending revision of the minor CSF deficiency identified below.

- a. The Chemical Abstract Service (CAS) number for the active ingredient must be included in box 10 on the CSF.
- b. The proposed product is identical to the registered product "Refined Oil of Nepeta Cataria 15% LIQUID" (EPA Reg. No. 352-905). Because the formulations are identical, the applicant has requested to bridge all data on the currently registered product to the proposed product. The request is acceptable.

2. Mammalian toxicology data requirements have been satisfied.

3. Nontarget organism toxicology data requirements are not applicable at this time.

- a. Because the source of the active ingredient is registered by the Agency, the nontarget organism toxicology data requirements have already been satisfied.

4. Product performance data requirements have been satisfied.

STUDY SUMMARIES

Biopesticide Use Pattern

The proposed EP is a dermally-applied insect repellent. The product is a spray that is applied every 4-6 hours and is used to repel mosquitos and black flies.

Product Chemistry

The proposed product, "Entomol 15% Liquid" is identical to the registered product "Refined Oil of Nepeta Cataria 15% LIQUID" (EPA Reg. No. 352-905). Because the formulations are identical, the applicant has requested to bridge all data on the currently registered product to the proposed product. A data matrix dated 04-21-2017 was submitted and the applicant is using the CITE-ALL method to satisfy the data requirements.

Note: in the original application, the applicant submitted an alternate formulation CSF which was determined to be unacceptable during the tech screen because it was not substantially similar to the basic formulation. The applicant has since withdrawn the alternate formulation CSF.

Refined oil of *Nepeta cataria*
PC Code: 004801
Type of Review: Product Chemistry, Human Health

DP Number: 440251
EPA File Symbol No.: 91889-G

Mammalian Toxicology

Because the two products are identical, all mammalian toxicology data can be bridged from the registered product to the proposed product.

Product Performance

Because the two products are identical, all product performance data can be bridged from the registered product to the proposed product.

cc: A. L. Gonzales, R. S. Jones, M. Adams, BPPD Science Review File, IHAD/ARS
A. L. Gonzales, Biologist, FT, PY-S: 08-15-17

Adams, Menyon

From: James Messina <jmessina@exponent.com>
Sent: Wednesday, June 21, 2017 12:07 PM
To: Adams, Menyon
Cc: Matthew Feinberg
Subject: RE: File symbol # 91889-G- 10-day letter
Attachments: Entomol Product Chemistry Requirements EP.DOCX

Dear Menyon,

Thank you for the letter. We have reviewed the letter and have the following questions:

1. Based upon the biochemical data requirements (40 CFR 158.2030), Entomol proposes to conduct the EP product chemistry data listed in the attached table using the Alternate Formulation #1. Can you please confirm the Agency's agreement?
2. The Agency noted that it is possible that the acute toxicology of Alternate Formulation #1 might be affected by the different inert ingredients. We propose to bridge the available acute toxicity data for the basic formulation by conducting the Dermal LD50 and Eye Irritation studies on Alternate Formulation #1. These represent the worst-case exposure for the dermally applied insect repellent and the worst-case acute toxicity. If the results are similar to the Basic Formulation data, Entomol will use the new data to bridge to cite the other existing acute toxicology data. If they differ substantially (i.e., result in a different EPA toxicity category), Entomol will then conduct the remaining acute toxicology studies. We note the table below provides the data results for the Basic Formulation. As you can see, the formulation resulted in low toxicity, except for eye irritation. We believe that testing the two worst-case exposures noted above will provide sufficient information to EPA to compare the Alternate Formulation #1 to the Basic Formulation. Can you please confirm the Agency's agreement?

Basic Formulation (15%) Acute Toxicology Data Results

Study	Result (Basic Formulation)	EPA Tox Cat	MRID
Acute Oral LD50	>5000 mg/kg	IV	47181301
Acute Dermal LD50	>5000 mg/kg	IV	47181302
Acute Inhalation LC50	>37 mg/L	IV	47181306
Dermal Irritation	Very slight erythema, cleared by 24 hours	IV	47181304
Eye Irritation	Irritating	II	47181303
Dermal Sensitization	Non-sensitizer	NA	47181305

3. The EPA letter did not mention efficacy. Can you please confirm if the Agency evaluated whether or not additional efficacy data is required to support Alternate Formulation #1? The formulation delivers the same ai at the same amount as was evaluated by the acceptable efficacy data on-file with EPA. The changes in Alternate Formulation #1 replaced the synthetic inert ingredients with more naturally derived inert ingredients that have identical purposes in the formulation. These alternate inert ingredients should have no impact on the efficacy of this product because the same amount of active ingredient is being applied. Please let us know if the Agency agrees.

Please provide feedback on the above as soon as possible as we need this information to determine how to respond to the 10-day deficiency letter.

Please let me know if you have any questions.

Best Regards,

James Messina
Center Director and Principal Regulatory Consultant
Exponent, Inc.
Chemical Regulation and Food Safety
1150 Connecticut Ave., NW, Suite 1100
Washington, DC 20036
O: 202.772.4932
M: 301.908.1181
jmessina@exponent.com

From: Adams, Menyon [mailto:Adams.Menyon@epa.gov]
Sent: Thursday, June 15, 2017 2:41 PM
To: James Messina
Cc: Matthew Feinberg
Subject: File symbol # 91889-G- 10-day letter

Hi Matthew,

Attach you'll find the Agency's 10 day letter as a result of the application technical screen. Feel free to give me a call if there are additional questions.

Best Regards,

Menyon Adams, Biologist
U.S. Environmental Protection Agency
Office of Pesticide Programs (7511P)
Biopesticides and Pollution Prevention Division (BPPD)
Biochemical Pesticides Branch (BPB)
adams.menyon@epa.gov
703-347-8496 (office)
703-305-0188 (fax)

End-Use Product Chemistry Data Requirements

EPA Guideline	Study Title	Test Material	EPA Guideline Link	Notes
880.1100	Product identity and composition	EP	https://www.regulations.gov/#!documentDetail;D=EPA-HQ-OPPT-2009-0158-0002	Prepare study (write-up)*
880.1200	Description of starting materials, production and formulation process	EP	https://www.regulations.gov/#!documentDetail;D=EPA-HQ-OPPT-2009-0158-0003	Prepare study (write-up)*
880.1400	Discussion of formulation of impurities	EP	https://www.regulations.gov/#!documentDetail;D=EPA-HQ-OPPT-2009-0158-0004	Prepare study (write-up)*
830.1750	Certified limits	EP	830.1750 - Certified Limits (August 1996)	Prepare CSF*
830.1800	Enforcement analytical method	EP	830.1800 - Enforcement Analytical Method (August 1996)	Obtain copy of method from DuPont and validate it with your end-use products*
830.6303	Physical state	EP	830.6303 - Physical State (August 1996)	Conduct study*
830.6315	Flammability	EP	830.6315 - Flammability (August 1996)	Conduct study*
830.6317	Storage stability	EP	830.6317 - Storage Stability (June 2002)	Conduct study: 1 year study to be submitted after registration approved*
830.6319	Miscibility	EP	https://www.regulations.gov/#!documentDetail;D=EPA-HQ-OPPT-2009-0151-0020	Submit waiver**
830.6320	Corrosion characteristics	EP	830.6320 - Corrosion Characteristics (August 1996)	Conduct study: 1 year study to be submitted after registration approved. Conduct as part of storage stability*
830.7000	pH	EP	https://www.regulations.gov/#!documentDetail;D=EPA-HQ-OPPT-2009-0151-0023	Conduct study*
830.7100	Viscosity	EP	https://www.regulations.gov/#!documentDetail;D=EPA-HQ-OPPT-2009-0151-0025	Conduct study*
830.7300	Density	EP	830.7300 - Density/Relative Density/Bulk Density (June 2002)	Conduct study*

*DuPont submitted actual study data. Conduct on Entomol's end-use product(s).

**Do not conduct study. Submit waiver request rationale.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JUN 15 2017

CERTIFIED MAIL

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Matthew Feinberg
Entomol Products, LLC
c/o Exponent
1150 Connecticut Ave, NW
Suite 1100
Washington, DC 20036

RE: Deficiencies and Issues Noted During Preliminary 45-Day Technical Screen
Product names: Entomol 15% Liquid
Active Ingredient: Nepeta Cataria Oils
EPA File Symbols: 91889-G
Pesticide Petition: N/A
Decision Numbers: 528935
PRIA Category: B660

Dear Mr. Feinberg,

As you know, the Pesticide Registration Improvement Act (PRIA 3) requires that all applications undergo a 45 or 90-day preliminary technical screen. While the screen is not intended to be a full Agency review of the materials submitted, the goal of the initial review is to determine if sufficient information has been presented so that the application can move into the more detailed science review. This process allows the Agency to better utilize its resources on those applications that are ready for review. It is important to note, however, that deficiencies may still be determined upon the completion of the full Agency review.

With respect to your new registration application (B660 --New product; registered source of active ingredient(s); identical or substantially similar in composition and use to a registered product), the Agency has completed its preliminary technical screening of your application pursuant to Section 33(f)(4)(B)(i)(II) of the Federal Insecticide, Fungicide, and Rodenticide (FIFRA) Act, as amended by PRIA 3. The Agency has determined that your application has not passed the preliminary technical screen and therefore is subject to rejection if the application is not corrected. We have found deficiencies which are outlined in the attached Confidential Appendix.

In order for the review of your product to continue, you will need to correct the item(s) listed in the confidential appendix within 10 business days of receipt of this letter. Corrections must be received by EPA by the 10th business day. EPA recommends sending your complete set of corrections by email to the contact listed below to ensure they are timely received. Partial responses are not acceptable. If studies or confidential information are being submitted by mail, a complete courtesy copy received by email by the deadline will be considered timely. If you cannot correct the application, or do not respond within 10 business days, your application will be rejected. Alternatively, you could also choose to withdraw your application at this time.

Should you elect not to withdraw, please understand that should your response to this 10-day letter not provide the Agency with the information requested, your application will be rejected.

The Agency wants to work with you to help move your application into the next phase of the regulatory process. We hope that the deficiencies can be addressed as outlined in the confidential appendix within the given timeframe. If you have additional questions or would like to arrange a meeting or teleconference, please contact Menyon Adams at (703) 347-8496 or via email at adams.menyon@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Linda A. Hollis", followed by the word "for" in a smaller, handwritten font.

Linda A. Hollis, Chief
Biochemical Pesticides Branch
Biopesticides and Pollution
Prevention Division (7511P)
Office of Pesticide Programs

Enclosure

~~CONFIDENTIAL APPENDIX~~

Deficiencies Noted During the Technical Screen:

EPA File Symbol: 91889-G (Entomol 15% Liquid)

Deficiency	Data/Information Submitted	Reason for Inadequacies	What Data/Information are Needed
Alternate Formulation Confidential Statement of Formula (CSF)	CSF dated April 21, 2017	The alternate formulation #1 CSF is not substantially similar to the basic formulation. There is significant variation in the identities of the inert ingredients between the formulations. While the inert ingredients have the same purpose in formulation, approximately 33% of the formulation differs in identities of inert ingredients. It is unknown if these differences affect product chemistry and toxicity of the End-Use Product (EP).	You must either remove alternate formulation #1 from the proposed substantially similar product registration application,

Biochemical Pesticide Technical Screen

Date of Tech Screen Completion: 6/9/17

PASS or FAIL: FAIL

RAL and Reviewer	Menyon Adams and Angela Gonzales
File Symbol/Registration/Petition No.	91889-G
PRIA Code	B660 (substantially similar)
Submission No.	1002569
Decision No.	528935

Confidential Statement of Formula (CSF)				
Item:	Description:	Yes	No	N/A
a.	Concurrence with Inerts Branch assessment of inert ingredient approval on CSF?			See below
b.	CSF accurately reflects label	X		
c.	Active(s) + Inert(s) = 100%	X		
d.	Chemical names and CAS #s provided for inerts	X		
e.	Units in all applicable boxes	X		
f.	Supplier information adequately listed	X		
g.	Certified limits correct?	X		
h.	If certified limits are outside recommended range, explanation provided?			X
i.	If there are alternate formulations, are they actually alternate and not a new product?		X	
Comments and Deficiencies: <ul style="list-style-type: none"> The basic formulation CSF of the proposed product is identical to the CSF of the cited product (EPA Reg. No. 352-905). The Inerts Branch has indicated on the basic formulation CSF that the inerts are not approved; however, the reviewer could not identify the reason because the Inert Status form was not in the package. According to the search conducted by the BPPD reviewer using the Inerts Finder, the inerts are cleared. The inerts have also been cleared in the product that is already registered. The alternate formulation is not substantially similar to the basic formulation and will require a separate registration. There is too much variation in the identities of the inert ingredients between the formulations. While the inert ingredients have the same purpose in formulation, approximately 33% of the formulation differs in identities of inert ingredients. It is unknown if these differences affect product chemistry and toxicity of the EP. Additionally, it appears that an inert ingredient in the alternate formulation has not been approved [REDACTED] according to the Inerts Branch. The reviewer did not have access to the Inert Status form, which should discuss the inert ingredient deficiency. 				

Data Matrix-EP				
Item:	Description:	Yes	No	N/A
a.	Are all product chemistry data requirements listed?	X		
b.	Are all mammalian toxicology data requirements listed?	X		
c.	Are all nontarget organism data requirements listed?			X
d.	Are all efficacy data listed?	X		
e.	If the a.i. is from a registered source, is the source registered for the EP's or MP's use pattern?	X		
Comments:				
No deficiencies noted at this time. The applicant is using CITE-ALL.				

Data Requirements-EP				
Item:	Description:	Yes	No	N/A
a.	Are all product chemistry data adequate for secondary review?			X
b.	Are all mammalian toxicology data adequate for secondary review?			X
c.	Are all nontarget organism data adequate for secondary review?			X
Comments:				
No deficiencies noted at this time. The applicant is using CITE-ALL.				



1150 Connecticut Ave. NW
Suite 1100
Washington, DC 20036

telephone 202-772-4900
facsimile 202-772-4979
www.exponent.com

May 19, 2017

Andrew Bryceland
Team Leader, Biochemicals Pesticides Branch
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Document Processing Desk
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

Subject: **Revised CSF in Support of Registration Application for Entomol 15%
Liquid
(EPA File Symbol: 91889-G)**

Dear Mr. Bryceland:

On behalf of our client Entomol Products, LLC (Entomol, 40 Gold Street, San Francisco, CA 94133, EPA Company Number 91889), Exponent is submitting the enclosed revised Basic CSF in support of the registration of the new end-use pesticide product, Entomol 15% Liquid (EPA File Symbol: 91889-G). The only revision included is to address a spelling error for one of the inert ingredients.

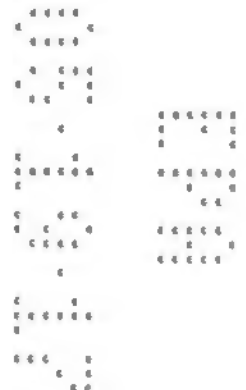
Please note that the enclosed information is considered ***Confidential Business Information*** and must not be disclosed to any party outside of EPA. If you have any questions or need additional information, please do not hesitate to contact me at (202) 772-4945 or mfeinberg@exponent.com.

Sincerely,

Matthew Feinberg
Authorized Representative of
Entomol Products, LLC

cc: Mark Sloneker, Entomol Products, LLC
Jim Messina, Exponent, Inc.

Enclosures



PRIA 3 – 21 Day Content Screen Review Worksheet

(EPA/OPP Use Only)

21 Day Screen Start Date: 4-21-17 September 2012

Experts In-Processing Signature: B.B. Date 4-28-17 Fee Paid: Yes ☒

Division management contacted on issues No ☐ Yes ☐ Date _____

EPA Reg. Number: <u>91889-G</u>		EPA Receipt Date: <u>4-21-17</u>				
Items for Review				Yes	No	N/A*
1	Application Form (EPA Form 8570-1) signed & complete including package type			X		
2	Confidential Statement of Formula all boxes completed, form signed, and dated (EPA Form 8570-4)			X		
	a) All <u>inerts</u> , including fragrances, approved for the proposed uses (see Footnote A)	yes	no			
			X			
3	Certification with Respect to Citation of Data (EPA Form 8570-34) completed and signed (N/A if 100% repack)			X		
	Certificate and data matrix consistent			X		
	If applicant is relying on data that are compensable, is the offer to pay statement included. (see Footnote B)	yes	no			
	If applicable, is there a letter of Authorization for exclusive use only.					
4	Formulator's Exemption Statement (EPA Form 8570-27) completed and signed (N/A if source is unregistered or applicant owns the technical)			X		
	Data Matrix (EPA Form 8570-35) both internal and external copies (PR 98-5) completed and signed (N/A if 100% repack)			X		
5	a) Selective Method (Fee category experts use)	yes	no			
	b) Cite-All (Fee category experts use)	X				
	c) Applicant owns all data (Fee category experts use)					
6	5 Copies of Label (Electronic labels on CD are encouraged and guidance is available)			X		
7	Is the data package consistent with PR Notice 86-5					X
8	Notice of Filing included with petitions					X

9	If applicable for conventional applications, <u>reduced risk rationale</u>			X
	<u>Required Data</u> and/or data waivers. See Footnote C.			
10	a) List study (or studies) not included with application			

Comments:

Documentation: Pass

- All required forms are complete.

Inserts: Fail

- Inserts not approved, see insert status form

11-3: N/A

- No study

Status: Fail

- MS 05/10/17

- Reg letter on (TH)

* N/A – Not Applicable

Footnotes

A. During the 21 day initial content review, all CSFs will be reviewed to determine whether all inerts listed, including fragrances, are approved for the proposed uses or have an application pending with the Agency. If an unapproved inert with no application pending with the Agency is identified, the applicant must either 1) resolve the inert issue by, for example, removing the inert, substituting it with an approved inert, submitting documentation that EPA approved the inert for the proposed pesticidal uses, correcting mistakes on the CSF, etc. or 2) provide the data to support OPP approval of the inert or 3) withdraw the application. Removing or substituting an inert ingredient will require a new CSF and may require submission of data. All information, forms, data and documentation resolving the inert issue must have been received by the Agency or the application withdrawn within the 21 day period, otherwise, the Agency will reject the application as described below.

To successfully complete this aspect of the 21 day initial content screen, applicants are **strongly encouraged** to verify that all inert ingredients have been approved for the application's uses or have an application pending with the Agency **even if a product is currently registered** by consulting the inert Web site and if the inert is not approved nor has an application pending with the Agency, to **obtain the necessary inert approval prior to submitting an application to register a pesticide product containing that inert ingredient**. Some inert ingredients are no longer approved for food uses or certain types of uses. The name and/or CAS number on a CSF must match the name and CAS number on this web site. Simple typographical errors in the name or CAS number have resulted in processing delays.

If an inert is not listed on the inert ingredient web site and the applicant believes that the inert has been approved, the applicant should contact the Inert Ingredient Assessment Branch (IIAB) at inertsbranch@epa.gov and resolve the issue. Copies of the correspondence with IIAB resolving the issue should accompany the application. All new inerts except PIP inerts are reviewed by IIAB. The IIAB should also be contacted for any questions on what supporting data needs to be submitted for and the Agency's inert review process. Questions on PIP inerts should be directed to the Chief of Microbial Pesticides Branch.

When a brand, trade, or proprietary name of an inert ingredient is listed on a CSF, additional information such as an alternate name of the inert, CAS number or other information must also be included to enable the Agency to determine if it has been approved. Each component of an inert mixture (including a fragrance) must be identified. In some cases, the supplier of the mixture or fragrance may need to provide this information to the Agency. Prior to the Agency's receipt of an application, applicants must arrange with a proprietary mixture or fragrance supplier to provide the component information to the Agency or promptly upon EPA's request. If the inert ingredients in a proprietary blend (including fragrances) cannot or are not identified or provided within the 21-day content review period, the Agency will reject the application.

During the 21 day content review, applicants should submit information to the individual identified by the Agency when the applicant is informed of an unapproved inert.

Unapproved Inerts Identified on CSFs

All applications except conventional new products and PIPs

Once an unapproved inert is identified on a CSF, the Agency will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Provide the required information necessary to identify an inert approval application that is pending with the Agency; or
3. Submit the information and data needed for the Agency to approve the unapproved inert. If this option is selected and implemented, the Agency may request an extension in the PRIA decision review timeframe to accommodate the inert review/approval process;
4. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of these options is selected and implemented by the applicant within the 21 day content review period, the Agency will reject the application and retain 25% of the full fee of the category identified.

Conventional New Product Applications

When the Registration Division identifies an unapproved inert on a CSF with an application for a new product that the applicant has not identified as requiring an inert approval (R300 or R301), it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Submit the information and data needed for the Agency to approve the unapproved inert, including any required petition to establish or amend a tolerance or exemption from a tolerance. (This option may change the PRIA category for the application, which could require a longer decision review time and a larger fee. If additional fees are due, they must be received by the Agency within the 21 day content review period.)

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21-day content-review period, the Agency will reject the application and retain 25% of the appropriate fee for the new product-inert approval category.

PIP Applications

When the Biopesticide and Pollution Prevention Division identifies an unapproved inert on a PIP CSF and a request to approve the inert does not accompany the application, it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the spelling or name of the inert to that in 40 CFR 174, or providing documentation that the inert has been approved; or
2. Submit the information and data needed for the Agency to approve the unapproved inert. If an inert ingredient tolerance exemption petition is required, the petition must be received by the Agency and the B903 fee paid within the 21 day period. If this option is selected and implemented, the Agency will discuss harmonizing the timeframe for both actions.
3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21 day content review period, the Agency will reject the application and retain 25% of the fee.

B. A policy on documentation of offers to pay is still being developed, however, for a me-too or fast track (similar/identical) new product, R300 or A530, an application without the necessary authorizations of offers to pay will be placed into either R301 or A531. The Agency recommends that authorizations of offers to pay be submitted with other PRIA applications to avoid delays in the Agency's decision.

C. Biopesticide applicants are advised to contact the Agency and discuss study waivers prior to submitting their application to the Agency. Documentation of such discussions should be submitted with the study waiver.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

April 27, 2017

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

OPP Decision Number: D-528935
EPA File Symbol or Registration Number: 91889-G
Product Name: ENTOMOL 15% LIQUID
EPA Receipt Date: 21-Apr-2017
EPA Company Number: 91889
Company Name: ENTOMOL, LLC.

MATTHEW FEINBERG
EXPONENT, INC.
AGENT FOR ENTOMOL, LLC.
1150 CONNECTICUT AVE., NW - SUITE 1100
WASHINGTON, DC 20036-

SUBJECT: Receipt of Application and 75% Small Business Waiver Request

Dear Registrant:

The Office of Pesticide Programs has received your application, 75% small business waiver request, and certification of payment. If you submitted data with this application, the results of the PRN-2011-3 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: B660

NEW PRODUCT;MICROBIAL/BIOCHEMICAL;REGISTERED SOURCE OF ACTIVE
INGREDIENT;ME-TOO;

Your request for waiver has been forwarded for review. You will be notified in writing when a determination is made regarding your request. If your waiver request is approved, the decision review time period will start on the date of approval. If your waiver request is denied, you will receive an invoice for the outstanding balance. If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703)-305-5659.

Sincerely,

A handwritten signature in black ink, appearing to be "M. J. H." or similar.

Front End Processing Staff
Information Technology & Resources Management Division

Fee for Service

{1002569b~

This package includes the following

☒ New Registration

☐ Amendment

☐ Studies? ☐ Fee Waiver?

☐ volpay % Reduction: ____

for Division

☐ AD

☒ BPPD

☐ RD

Risk Mgr. 91

Receipt No.

S-

1002569

EPA File Symbol/Reg. No.

91889-G

Pin-Punch Date:

4/21/2017

☐ This item is NOT subject to FFS action.

Action Code:

Requested: B660

Granted: B660

Amount Due: \$ ____

Parent/Child Decisions:

☒ Inert Cleared for Intended Use

☐ Uncleared Inert in Product

Reviewer: Andrew Byceland Date: 4-26-17

Remarks:



Receipt for Section 3

S: 1002569

Milestone Email:

Regulatory Type: Product Registration - Section 3

Resubmission: ☐ Yes ☒ No

Print Letter

Application Type: New Registration

Fee For Service: ☐ Yes ☒ No

Enter More Information

Billable: ☐ Yes ☒ No

Tracking

Company: 91889 ENTOMOL, LLC.



Risk Manager: Biologicals & Pollution Prevention Division, PM Team 91

Product #: 91889-G

Product Name: ENTOMOL PRODUCTS, LLC

Override#:

☒ Me Too Section3: 352-905

Me Too Product Name: REFINED OIL OF NEPETA CATARIA 15% LIQ...

Application Date: 21-Apr-2017



OPP Rec'd Date: 21-Apr-2017



Front End Date: 24-Apr-2017



Risk Manager Send Date:



FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track: ☐

New Ingredient: ☐

Receipt Description:

NEW REGISTRATION WITH FEE WAIVER

New Ingredient

Request Date:

New Ingredient

Received Date:

Form A: ☐

Signature Date:

Form B: ☐

Signature Date:

Receipt Content

CSF

Paper Label

View/Edit

({

Your payment has been submitted to Pay.gov and the details are below. If you have any questions regarding this payment, please contact Michael Yanchulis at (703) 347-0237 or yanchulis.michael@epa.gov.

Application Name: PRIA Service Fees
Pay.gov Tracking ID: 261M6101
Agency Tracking ID: 75218834556
Transaction Type: Sale
Transaction Date: 04/04/2017 05:44:53 PM EDT

Account Holder Name: Mark S Sloneker

Transaction Amount: \$320.00
Card Type: MasterCard
Card Number: *****2178

Registration Number:
Company Name: Entomol Products LLC
Company Number: 91889
Action Code: B660

THIS IS AN AUTOMATED MESSAGE. PLEASE DO NOT REPLY.





United States
Environmental Protection Agency
Washington, DC 20460

☒ Registration
☐ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 91889-NEW	2. EPA Product Manager	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Entomol Products, LLC	PM#	
5. Name and Address of Applicant (Include ZIP Code) Entomol Products, LLC 40 Gold Street San Francisco, CA 94133 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. 352-905 Product Name Refined Oil of Nepeta Cataria	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input checked="" type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of a Section 3 Me-Too Registration Application for Entomol 15% Liquid.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal	
* Certification must be submitted				<input type="checkbox"/> Plastic	
	If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 2 oz containers		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Matthew Feinberg		Title Authorized Representative		Telephone No. (Include Area Code) 202-772-4945	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature 		3. Title Authorized Representative for Entomol			
4. Typed Name Matthew Feinberg		5. Date April 21, 2017			



United States
Environmental Protection Agency
Washington, DC 20460
Formulator's Exemption Statement
(40 CFR 152.85)

Applicant's Name and Address Entomol Products, LLC 40 Gold Street San Francisco, CA 94133	EPA File Symbol/Registration Number 91889-NEW
	Product Name Entomol 15% Liquid
	Date of Confidential Statement of Formula (EPA Form 8570-4) 04/21/2017

As an authorized representative of the applicant for registration of the product identified above, I certify that:

- (1) This product contains the following active ingredient(s):

Refined Oil of *Nepeta cataria*

- (2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another person and meets the requirements of 40 CFR section 158.50(e)(2) or (3).

- (3) Indicate by checking (A) or (B) below which paragraph applies:

- ☐ (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

- ☒ (B) The Confidential Statement of Formula (CSF)(EPA Form 8570-4) referenced above and on file with the EPA is complete, current, an accurate and contains the information required on the current CSF.

- (4) The following active ingredients in this product qualify for the formulator's exemption.

Source		
Active Ingredient	Product Name	Registration Number
Refined Oil of <i>Nepeta cataria</i>	[REDACTED]	[REDACTED]
Signature 	Name and Title Matthew Feinberg, Authorized	Date 04/21/2017

EPA Form 8570-27 (Rev. 06-2004)

Copy 1 - EPA
Copy 2 - Applicant copy

Product ingredient source information may be entitled to confidential treatment



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
1200 Pennsylvania Avenue, N.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collection Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the completed form to this address.

Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number Entomol, LLC, 40 Gold Street, San Francisco, CA 94133; 415-310-2553	EPA Registration Number/File Symbol 91889-NEW
Active Ingredient(s) and/or representative test compound(s) Refined oil of Nepeta cataria	Date 4/21/2017
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Residential Indoor Use, non-food	Product Name ENTOMOL 15% Liquid

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

☒ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

☐ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature 	Date 4/21/2017	Typed or Printed Name and Title Matthew Feinberg, Authorized Representative
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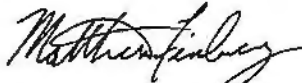


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.
WASHINGTON, D.C. 20460

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DATA MATRIX

Date: April 21, 2017		EPA Reg No./File Symbol 91889-NEW		Page 1 of 1	
Applicant's/Registrant's Name & Address Entomol Products, LLC, 40 Gold Street, San Francisco, CA 94133		Product Entomol 15% Liquid			
Ingredient Refined Oil of <i>Nepeta cataria</i> , CAS Registry No. 952722-18-8, OPP Chemical Code 004801					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.1550 to 830.1670	Group A Product Chemistry	CITE-ALL	E. I. du Pont de Nemours and Company	PER	
830.1750	Certified Limits	CITE-ALL	E. I. du Pont de Nemours and Company	PER	
830.1800	Enforcement Analytical Method	CITE-ALL	E. I. du Pont de Nemours and Company	PER	
830.6302 to 830.7950	Group B Product Chemistry	CITE-ALL	E. I. du Pont de Nemours and Company	PER	
870.1100	Acute Oral	CITE-ALL	E. I. du Pont de Nemours and Company	PER	
870.1200	Acute Dermal	CITE-ALL	E. I. du Pont de Nemours and Company	PER	
870.1300	Acute Inhalation	CITE-ALL	E. I. du Pont de Nemours and Company	PER	
870.2400	Primary Eye Irritation	CITE-ALL	E. I. du Pont de Nemours and Company	PER	
870.2500	Primary Dermal Irritation	CITE-ALL	E. I. du Pont de Nemours and Company	PER	
870.2600	Dermal Sensitization	CITE-ALL	E. I. du Pont de Nemours and Company	PER	
Series 810	Efficacy	CITE-ALL	E. I. du Pont de Nemours and Company	PER	
Signature 			Name and Title Matthew Feinberg, Authorized Representative for Entomol Products, LLC		Date 04/21/2017




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.
WASHINGTON, D.C. 20460

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DATA MATRIX

Date: April 21, 2017		EPA Reg No./File Symbol 91889-NEW		Page 1 of 1	
Applicant's/Registrant's Name & Address Entomol Products, LLC, 40 Gold Street, San Francisco, CA 94133		Product Entomol 15% Liquid			
Ingredient Refined Oil of <i>Nepeta cataria</i> , CAS Registry No. 952722-18-8, OPP Chemical Code 004801					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			E. I. du Pont de Nemours and Company	PER	
			E. I. du Pont de Nemours and Company	PER	
			E. I. du Pont de Nemours and Company	PER	
			E. I. du Pont de Nemours and Company	PER	
			E. I. du Pont de Nemours and Company	PER	
			E. I. du Pont de Nemours and Company	PER	
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			E. I. du Pont de Nemours and Company	PER	
			E. I. du Pont de Nemours and Company	PER	
			E. I. du Pont de Nemours and Company	PER	
			E. I. du Pont de Nemours and Company	PER	
Signature 			Name and Title Matthew Feinberg, Authorized Representative for Entomol Products, LLC		Date 04/21/2017

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Entomol 15% Liquid
(Insect repellent)(Liquid)
(Repels Mosquitoes and Blackflies)
(Insect Repellent Pump-Spray)

ACTIVE INGREDIENT:

Refined Oil of *Nepeta cataria* 15.0%

OTHER INGREDIENTS 85.0%

TOTAL: **100.0%**

KEEP OUT OF REACH OF CHILDREN

WARNING

(See (Back) (or) (Side) (Label Panel(s)) (Product Leaflet) for Additional
Precautionary Statements)

FIRST AID	
If in Eyes:	<ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after 5 minutes, then continue rinsing eye.• Call a Poison Control Center or doctor for further treatment advice.
If swallowed:	<ul style="list-style-type: none">• Call Poison Control Center or doctor immediately for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by the poison control center or doctor.• Do not give anything by mouth to an unconscious person.
HOTLINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For emergency information on this pesticide product (including health concerns, medical emergencies, or pesticide incidents), call the poison control center at 1-800-222-1222. For non-emergency information concerning this product, call the National Pesticides Information Center (NPIC) at 1-800-858-7378 (NPIC Web site: www.npic.orst.edu)	

EPA Reg. No. 91889-NEW
EPA Est. No. XXXXX-YY-ZZZ

NET CONTENTS:
BATCH NO.:

Manufactured By:
Entomol Products, LLC
40 Gold Street
San Francisco, CA 94133

Label Version: 4/21/2017

Page 1 of 6

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PRECAUTIONARY STATEMENTS

HAZARD TO HUMANS AND DOMESTIC ANIMALS. WARNING. Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

PHYSICAL AND CHEMICAL HAZARDS

FLAMMABLE: Keep away from Heat and Open Flame.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Repellency – Repels mosquitoes and blackflies for up to 7 hours.

Do not allow children to handle the product or apply it to themselves. If used on the face, spray/dispense on hands first and then apply sparingly and avoid eyes. Do not spray directly onto face.

Dispense/Spray apply a small amount of liquid directly onto skin. Spread uniformly to completely cover any exposed skin surface. Use sparingly on face and avoid contact with eyes. Reapply after 4-6 hours (or as needed).

When applying to children, dispense into an adult's hand and then spread evenly and completely over the child's exposed skin taking care not to contact the child's fingers and hands. Do not apply over cuts or damaged skin. When applying to children, dispense into an adults hand and then spread evenly and completely over the child's exposed skin taking care not to contact the child's fingers and hands.

Do not apply over cuts or damaged skin. After returning indoors, wash treated skin with soap and water or bathe. Also wash clothing before wearing it again.

STORAGE AND DISPOSAL

Do not contaminate water or food by storage or disposal.

PESTICIDE STORAGE: Store away from children.

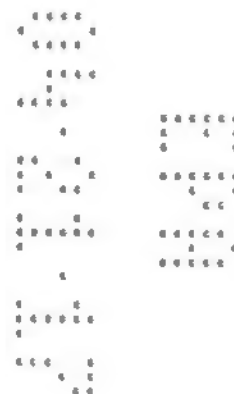
PESTICIDE DISPOSAL: Do not contaminate water, food or feed by storage or disposal. Never place unused product down any indoor or outdoor drain.

CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. If empty: Offer for recycling if available or discard in a sanitary landfill. If partly filled: Call your local solid waste agency for disposal instructions.

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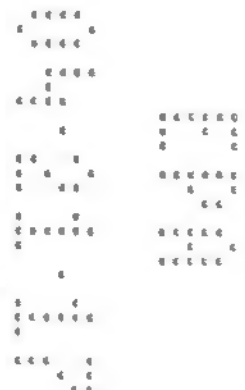
{NOTE TO REVIEWER: All claims in this section are optional}

- Mosquito repellent
- Blackfly repellent
- Repels mosquitoes
- Repels blackflies
- Effective protection from mosquitoes, blackflies
- Effectively repels mosquitoes and blackflies
- (Effective) protection (from a range of mosquitoes and blackflies)
- Repels mosquitoes that may carry (West Nile Virus) (and) (Eastern Equine Encephalitis)
- Works great on blackflies
- Protection (from bites) from blackflies (for the whole family)
- Protection for people on the go
- Protection that fits your lifestyle
- Protects from mosquitoes (and) (blackflies) (for up to 7 hours)
- Apply every 6 hours (or as needed)
- Repels mosquitoes and blackflies (for up to 7 hours)
- (Smart) Outdoor protection (from annoying) (mosquitoes) (and) (blackflies) (for up to 7 hours)
- Repels flies (too!)
- Keeps (mosquitoes) (and) (blackflies) off (your family)
- Guards the whole family (safely)
- Protection that fits your (active) lifestyle
- Protect(s) your family at dusk and dawn
- An effective insect repellent
- Protection during outdoor activities
- (Sport) (Active) (Outdoor) formula
- Outdoor mosquito and blackfly protection for play and on the go
- For yardwork and camping
- Protects during work, play or recreation
- Contains (a) plant-based repellent
- Plant based repellent that repels (mosquitoes) (and) (blackflies) (for) (up to 7 hours)
- Contains plant extracts
- Contains the insect repellent found in (catmint) (catnip) (oil)
- (Plant based) (insect repellent without trade offs)
- Always carry (product name)
- For playing and relaxing outdoors
- Not oily, greasy or sticky
- No added fragrance
- Contains no dyes (or added fragrances)
- No chemical odor
- No synthetic odor
- No unpleasant odor
- Leaves pleasant feeling on skin



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- Won't stain
- (Readily) (Easily) washed off
- Won't harm plastics
- Specially formulated to (feel) (and) (smell) better on your skin
- (light) (gentle) (clean) (mild) (smooth) (non-greasy) (pleasant) (feels great) (comfortable) formula
- No residue on skin
- (It's) pleasant smelling
- Feels comfortable (to touch)
- DEET free
- Non DEET
- Non synthetic
- Readily washed off
- New!
- Repels (mosquitoes) (and) (blackflies)
- Repels mosquitoes that may carry (West Nile) (St. Louis) (Eastern equine) (Western equine) (LaCrosse) (Cache Valley) encephalitis (for up to 7 hours)
- Provides protection from mosquitoes
- Up to 7 hour mosquito and blackfly repellent
- Up to 7 hour protection
- Up to 7 hours of (effective) mosquito (and) (blackfly) protection
- Up to 7 hours of protection from mosquitoes. (Also) (protects against) (works on) (repels) (blackflies)
- Protects for up to 7 hours against (mosquitoes) (and blackflies)
- (Protects against) (Fights off) (Repels) (Works on) (mosquitoes) (and) (blackflies)
- Protects against mosquitoes (and) (blackflies)
- Long-lasting protection against (mosquitoes) (and blackflies)
- Effective protection from mosquitoes
- Effective protection from blackflies
- Stay protected for up to 7 hours (from) (mosquitoes) (and) (blackflies)
- Stay protected for up to 7 hours from mosquitoes that may carry (West Nile Virus) (St. Louis) (Eastern equine) (Western equine) (LaCrosse) (Cache Valley) encephalitis
- Proven protection from mosquitoes
- Up to 7 hour insect repellent
- Up to 7 hour protection
- (Up to) 7 hours of (effective) mosquito protection
- (Up to) 7 hours of protection from mosquitoes. Also (protects against) (works on) (repels) (blackflies)
- Protects for (up to) 7 hours against (mosquitoes)(,) (and) (blackflies)
- (Protects against) (Fights off) (Repels) (Works on) (mosquitoes)(,) (and) (blackflies)
- Protects against mosquitoes and (blackflies)
- Long-lasting protection against (mosquitoes)(,) (and) (blackflies)



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- Effective protection from mosquitoes
- Effective protection from blackflies
- Stay protected for up to 7 hours (from) (mosquitoes)(,) (and) (blackflies)
- Stay protected for up to 7 hours from mosquitoes that may carry (West Nile) (St. Louis) (Eastern equine) (Western equine) (LaCrosse) (Cache Valley) encephalitis
- Proven protection from mosquitoes
- Mosquito protection (for up to 7 hours)
- Biting (mosquito) (and) (blackfly) protection that you can feel confident will last up to 7 hours.
- Repels mosquitoes (for up to 7 hours)
- Repels blackflies (for up to 7 hours)
- Easy to (Use) (Apply)
- For (hiking) (fishing) (hunting) (camping) (backpacking)
- Relax and enjoy the (outdoors)(,) (the great outdoors)(,) (backyard)(,) (outside)(,) (park)(,) (woods/forest) with up to 7 hours of protection against (mosquitoes) (and) (blackflies)
- Portable repellent protection
- Comfortable feel with no chemical (odor)(smell)
- Comfortable feel with pleasant smell
- Long-lasting
- Contains Refined Oil of *Nepeta cataria*
- Essential oil based repellent, not a synthetic chemical.
- Plant based essential oil insect repellent.
- Essential oil insect repellent with up to 7 hours of effective protection (against) (mosquitoes) (and) (blackflies)
- Insect repellent with up to 7 hours of effective protection (against mosquitoes) and (blackflies)
- An essential oil repellent that protects against mosquitoes that may carry West Nile Virus
- Repels mosquitoes that may carry West Nile Virus and Encephalitis
- Effective mosquito repellent
- Repels mosquitoes for up to 7 hours, which may carry West Nile Virus and Encephalitis
- Plant based, essential oil that repels mosquitoes for up to 7 hours
- A plant based insect repellent with up to 7 hours of effective protection
- Good for people
- Protects people
- Produced from a renewable resource

(LIMITATION OF WARRANTY AND LIABILITY)

(NOTICE: Read this Limitation of Warranty and Liability Before Buying or Using This Product. Entomol Products, LLC will not be responsible for losses or damages resulting from the use of this product in any manner not specifically directed by Entomol Products, LLC.

() – Denotes optional label language
{ } – Denotes a comment for the reviewer

User assumes all risks associated with such non-directed use. If the Terms Are Not Acceptable, Return the Product at Once, Unopened, and the Purchase Price Will Be Refunded.

It is impossible to eliminate all risks associated with the use of this product. Such risks arise from weather conditions, presence of other materials, the manner of use or application, or other unknown factors, all of which are beyond the control of Entomol Products, LLC. These risks can cause: ineffectiveness of the product. **WHEN YOU BUY OR USE THIS PRODUCT, YOU AGREE TO ACCEPT THESE RISKS.**

Entomol Products, LLC warrants that this product conforms to the chemical description on the label thereof and is reasonably fit for the purpose stated in the Directions for Use, subject to the inherent risks described above, when used in accordance with the Directions for Use under normal conditions.)

(TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ENTOMOL, LLC MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF FITNESS OR OF MERCHANTABILITY OR ANY OTHER EXPRESS OR IMPLIED WARRANTY. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, IN NO EVENT SHALL ENTOMOL PRODUCTS, LLC OR SELLER BE LIABLE FOR ANY INCIDENTAL, CONSEQUENTIAL OR SPECIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT. BUYER'S OR USER'S BARGAINED-FOR EXPECTATION IS INSECT REPELLING. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER AND THE EXCLUSIVE LIABILITY OF ENTOMOL, LLC OR SELLER, FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY OR CONTRACT, NEGLIGENCE, TORT OR STRICT LIABILITY), WHETHER FROM FAILURE TO PERFORM OR INJURY TO OTHER, AND RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT, OR AT THE ELECTION OF ENTOMOL PRODUCTS, LLC OR SELLER, THE REPLACEMENT OF THE PRODUCT.

To the extent consistent with applicable law that allows such requirement, Entomol Products, LLC or its Ag Retailer must have prompt notice of any claim so that an immediate inspection of buyer's or user's can be made. Buyer and all users shall promptly notify Entomol Products, LLC or its Ag Retailer of any claims, whether based on contract, negligence, strict liability, other tort or otherwise, or be barred from any remedy. This Limitation of Warranty and Liability may not be amended by any oral or written agreement.)

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Entomol 15% Liquid
(Insect repellent)(Liquid)
(Repels Mosquitoes and Blackflies)
(Insect Repellent Pump-Spray)

ACTIVE INGREDIENT:

Refined Oil of *Nepeta cataria* 15.0%

OTHER INGREDIENTS 85.0%

TOTAL: **100.0%**

KEEP OUT OF REACH OF CHILDREN

WARNING

(See (Back) (or) (Side) (Label Panel(s)) (Product Leaflet) for Additional
Precautionary Statements)

FIRST AID	
If in Eyes:	<ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after 5 minutes, then continue rinsing eye.• Call a Poison Control Center or doctor for further treatment advice.
If swallowed:	<ul style="list-style-type: none">• Call Poison Control Center or doctor immediately for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by the poison control center or doctor.• Do not give anything by mouth to an unconscious person.
HOTLINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For emergency information on this pesticide product (including health concerns, medical emergencies, or pesticide incidents), call the poison control center at 1-800-222-1222. For non-emergency information concerning this product, call the National Pesticides Information Center (NPIC) at 1-800-858-7378 (NPIC Web site: www.npic.orst.edu)	

EPA Reg. No. 91889-NEW
EPA Est. No. XXXXX-YY-ZZZ

NET CONTENTS:
BATCH NO.:

Manufactured By:
Entomol Products, LLC
40 Gold Street
San Francisco, CA 94133

Label Version: 4/21/2017

Page 1 of 6

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PRECAUTIONARY STATEMENTS

HAZARD TO HUMANS AND DOMESTIC ANIMALS. WARNING. Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

PHYSICAL AND CHEMICAL HAZARDS

FLAMMABLE: Keep away from Heat and Open Flame.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Repellency – Repels mosquitoes and blackflies for up to 7 hours.

Do not allow children to handle the product or apply it to themselves. If used on the face, spray/dispense on hands first and then apply sparingly and avoid eyes. Do not spray directly onto face.

Dispense/Spray apply a small amount of liquid directly onto skin. Spread uniformly to completely cover any exposed skin surface. Use sparingly on face and avoid contact with eyes. Reapply after 4-6 hours (or as needed).

When applying to children, dispense into an adult's hand and then spread evenly and completely over the child's exposed skin taking care not to contact the child's fingers and hands. Do not apply over cuts or damaged skin. When applying to children, dispense into an adults hand and then spread evenly and completely over the child's exposed skin taking care not to contact the child's fingers and hands.

Do not apply over cuts or damaged skin. After returning indoors, wash treated skin with soap and water or bathe. Also wash clothing before wearing it again.

STORAGE AND DISPOSAL

Do not contaminate water or food by storage or disposal.

PESTICIDE STORAGE: Store away from children.

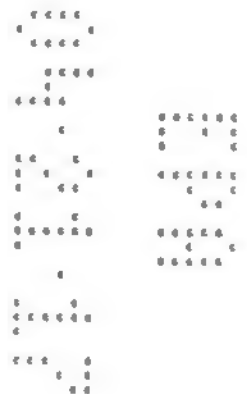
PESTICIDE DISPOSAL: Do not contaminate water, food or feed by storage or disposal. Never place unused product down any indoor or outdoor drain.

CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. If empty: Offer for recycling if available or discard in a sanitary landfill. If partly filled: Call your local solid waste agency for disposal instructions.

- () – Denotes optional label language
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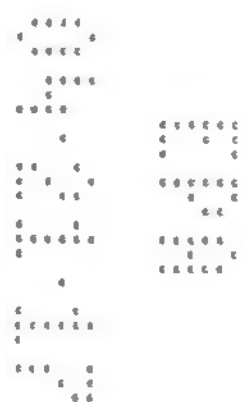
{NOTE TO REVIEWER: All claims in this section are optional}

- Mosquito repellent
- Blackfly repellent
- Repels mosquitoes
- Repels blackflies
- Effective protection from mosquitoes, blackflies
- Effectively repels mosquitoes and blackflies
- (Effective) protection (from a range of mosquitoes and blackflies)
- Repels mosquitoes that may carry (West Nile Virus) (and) (Eastern Equine Encephalitis)
- Works great on blackflies
- Protection (from bites) from blackflies (for the whole family)
- Protection for people on the go
- Protection that fits your lifestyle
- Protects from mosquitoes (and) (blackflies) (for up to 7 hours)
- Apply every 6 hours (or as needed)
- Repels mosquitoes and blackflies (for up to 7 hours)
- (Smart) Outdoor protection (from annoying) (mosquitoes) (and) (blackflies) (for up to 7 hours)
- Repels flies (too!)
- Keeps (mosquitoes) (and) (blackflies) off (your family)
- Guards the whole family (safely)
- Protection that fits your (active) lifestyle
- Protect(s) your family at dusk and dawn
- An effective insect repellent
- Protection during outdoor activities
- (Sport) (Active) (Outdoor) formula
- Outdoor mosquito and blackfly protection for play and on the go
- For yardwork and camping
- Protects during work, play or recreation
- Contains (a) plant-based repellent
- Plant based repellent that repels (mosquitoes) (and) (blackflies) (for) (up to 7 hours)
- Contains plant extracts
- Contains the insect repellent found in (catmint) (catnip) (oil)
- (Plant based) (insect repellent without trade offs)
- Always carry (product name)
- For playing and relaxing outdoors
- Not oily, greasy or sticky
- No added fragrance
- Contains no dyes (or added fragrances)
- No chemical odor
- No synthetic odor
- No unpleasant odor
- Leaves pleasant feeling on skin



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 { } – Denotes a comment for the reviewer

- Won't stain
- (Readily) (Easily) washed off
- Won't harm plastics
- Specially formulated to (feel) (and) (smell) better on your skin
- (light) (gentle) (clean) (mild) (smooth) (non-greasy) (pleasant) (feels great) (comfortable) formula
- No residue on skin
- (It's) pleasant smelling
- Feels comfortable (to touch)
- DEET free
- Non DEET
- Non synthetic
- Readily washed off
- New!
- Repels (mosquitoes) (and) (blackflies)
- Repels mosquitoes that may carry (West Nile) (St. Louis) (Eastern equine) (Western equine) (LaCrosse) (Cache Valley) encephalitis (for up to 7 hours)
- Provides protection from mosquitoes
- Up to 7 hour mosquito and blackfly repellent
- Up to 7 hour protection
- Up to 7 hours of (effective) mosquito (and) (blackfly) protection
- Up to 7 hours of protection from mosquitoes. (Also) (protects against) (works on) (repels) (blackflies)
- Protects for up to 7 hours against (mosquitoes) (and) (blackflies)
- (Protects against) (Fights off) (Repels) (Works on) (mosquitoes) (and) (blackflies)
- Protects against mosquitoes (and) (blackflies)
- Long-lasting protection against (mosquitoes) (and) (blackflies)
- Effective protection from mosquitoes
- Effective protection from blackflies
- Stay protected for up to 7 hours (from) (mosquitoes) (and) (blackflies)
- Stay protected for up to 7 hours from mosquitoes that may carry (West Nile Virus) (St. Louis) (Eastern equine) (Western equine) (LaCrosse) (Cache Valley) encephalitis
- Proven protection from mosquitoes
- Up to 7 hour insect repellent
- Up to 7 hour protection
- (Up to) 7 hours of (effective) mosquito protection
- (Up to) 7 hours of protection from mosquitoes. Also (protects against) (works on) (repels) (blackflies)
- Protects for (up to) 7 hours against (mosquitoes)(,) (and) (blackflies)
- (Protects against) (Fights off) (Repels) (Works on) (mosquitoes)(,) (and) (blackflies)
- Protects against mosquitoes and (blackflies)
- Long-lasting protection against (mosquitoes)(,) (and) (blackflies)



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- Effective protection from mosquitoes
- Effective protection from blackflies
- Stay protected for up to 7 hours (from) (mosquitoes)(,) (and) (blackflies)
- Stay protected for up to 7 hours from mosquitoes that may carry (West Nile) (St. Louis) (Eastern equine) (Western equine) (LaCrosse) (Cache Valley) encephalitis
- Proven protection from mosquitoes
- Mosquito protection (for up to 7 hours)
- Biting (mosquito) (and) (blackfly) protection that you can feel confident will last up to 7 hours.
- Repels mosquitoes (for up to 7 hours)
- Repels blackflies (for up to 7 hours)
- Easy to (Use) (Apply)
- For (hiking) (fishing) (hunting) (camping) (backpacking)
- Relax and enjoy the (outdoors)(,) (the great outdoors)(,) (backyard)(,) (outside)(,) (park)(,) (woods/forest) with up to 7 hours of protection against (mosquitoes) (and) (blackflies)
- Portable repellent protection
- Comfortable feel with no chemical (odor)(smell)
- Comfortable feel with pleasant smell
- Long-lasting
- Contains Refined Oil of *Nepeta cataria*
- Essential oil based repellent, not a synthetic chemical.
- Plant based essential oil insect repellent.
- Essential oil insect repellent with up to 7 hours of effective protection (against) (mosquitoes) (and) (blackflies)
- Insect repellent with up to 7 hours of effective protection (against mosquitoes) and (blackflies)
- An essential oil repellent that protects against mosquitoes that may carry West Nile Virus
- Repels mosquitoes that may carry West Nile Virus and Encephalitis
- Effective mosquito repellent
- Repels mosquitoes for up to 7 hours, which may carry West Nile Virus and Encephalitis
- Plant based, essential oil that repels mosquitoes for up to 7 hours
- A plant based insect repellent with up to 7 hours of effective protection
- Good for people
- Protects people
- Produced from a renewable resource

(LIMITATION OF WARRANTY AND LIABILITY)

(NOTICE: Read this Limitation of Warranty and Liability Before Buying or Using This Product. Entomol Products, LLC will not be responsible for losses or damages resulting from the use of this product in any manner not specifically directed by Entomol Products, LLC.

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User assumes all risks associated with such non-directed use. If the Terms Are Not Acceptable, Return the Product at Once, Unopened, and the Purchase Price Will Be Refunded.

It is impossible to eliminate all risks associated with the use of this product. Such risks arise from weather conditions, presence of other materials, the manner of use or application, or other unknown factors, all of which are beyond the control of Entomol Products, LLC. These risks can cause: ineffectiveness of the product. **WHEN YOU BUY OR USE THIS PRODUCT, YOU AGREE TO ACCEPT THESE RISKS.**

Entomol Products, LLC warrants that this product conforms to the chemical description on the label thereof and is reasonably fit for the purpose stated in the Directions for Use, subject to the inherent risks described above, when used in accordance with the Directions for Use under normal conditions.)

(TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ENTOMOL, LLC MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF FITNESS OR OF MERCHANTABILITY OR ANY OTHER EXPRESS OR IMPLIED WARRANTY. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, IN NO EVENT SHALL ENTOMOL PRODUCTS, LLC OR SELLER BE LIABLE FOR ANY INCIDENTAL, CONSEQUENTIAL OR SPECIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT. BUYER'S OR USER'S BARGAINED-FOR EXPECTATION IS INSECT REPELLING. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER AND THE EXCLUSIVE LIABILITY OF ENTOMOL, LLC OR SELLER, FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY OR CONTRACT, NEGLIGENCE, TORT OR STRICT LIABILITY), WHETHER FROM FAILURE TO PERFORM OR INJURY TO OTHER, AND RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT, OR AT THE ELECTION OF ENTOMOL PRODUCTS, LLC OR SELLER, THE REPLACEMENT OF THE PRODUCT.

To the extent consistent with applicable law that allows such requirement, Entomol Products, LLC or its Ag Retailer must have prompt notice of any claim so that an immediate inspection of buyer's or user's can be made. Buyer and all users shall promptly notify Entomol Products, LLC or its Ag Retailer of any claims, whether based on contract, negligence, strict liability, other tort or otherwise, or be barred from any remedy. This Limitation of Warranty and Liability may not be amended by any oral or written agreement.)

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Entomol 15% Liquid
(Insect repellent)(Liquid)
(Repels Mosquitoes and Blackflies)
(Insect Repellent Pump-Spray)

ACTIVE INGREDIENT:

Refined Oil of *Nepeta cataria* 15.0%

OTHER INGREDIENTS 85.0%

TOTAL: **100.0%**

KEEP OUT OF REACH OF CHILDREN

WARNING

(See (Back) (or) (Side) (Label Panel(s)) (Product Leaflet) for Additional
Precautionary Statements)

FIRST AID	
If in Eyes:	<ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after 5 minutes, then continue rinsing eye.• Call a Poison Control Center or doctor for further treatment advice.
If swallowed:	<ul style="list-style-type: none">• Call Poison Control Center or doctor immediately for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by the poison control center or doctor.• Do not give anything by mouth to an unconscious person.
HOTLINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For emergency information on this pesticide product (including health concerns, medical emergencies, or pesticide incidents), call the poison control center at 1-800-222-1222. For non-emergency information concerning this product, call the National Pesticides Information Center (NPIC) at 1-800-858-7378 (NPIC Web site: www.npic.orst.edu)	

EPA Reg. No. 91889-NEW
EPA Est. No. XXXXX-YY-ZZZ

NET CONTENTS:
BATCH NO.:

Manufactured By:
Entomol Products, LLC
40 Gold Street
San Francisco, CA 94133

Label Version: 4/21/2017

Page 1 of 6

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PRECAUTIONARY STATEMENTS

HAZARD TO HUMANS AND DOMESTIC ANIMALS. WARNING. Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

PHYSICAL AND CHEMICAL HAZARDS

FLAMMABLE: Keep away from Heat and Open Flame.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Repellency – Repels mosquitoes and blackflies for up to 7 hours.

Do not allow children to handle the product or apply it to themselves. If used on the face, spray/dispense on hands first and then apply sparingly and avoid eyes. Do not spray directly onto face.

Dispense/Spray apply a small amount of liquid directly onto skin. Spread uniformly to completely cover any exposed skin surface. Use sparingly on face and avoid contact with eyes. Reapply after 4-6 hours (or as needed).

When applying to children, dispense into an adult's hand and then spread evenly and completely over the child's exposed skin taking care not to contact the child's fingers and hands. Do not apply over cuts or damaged skin. When applying to children, dispense into an adults hand and then spread evenly and completely over the child's exposed skin taking care not to contact the child's fingers and hands.

Do not apply over cuts or damaged skin. After returning indoors, wash treated skin with soap and water or bathe. Also wash clothing before wearing it again.

STORAGE AND DISPOSAL

Do not contaminate water or food by storage or disposal.

PESTICIDE STORAGE: Store away from children.

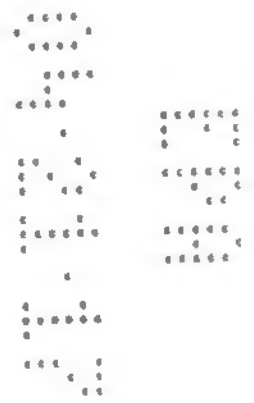
PESTICIDE DISPOSAL: Do not contaminate water, food or feed by storage or disposal. Never place unused product down any indoor or outdoor drain.

CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. If empty: Offer for recycling if available or discard in a sanitary landfill. If partly filled: Call your local solid waste agency for disposal instructions.

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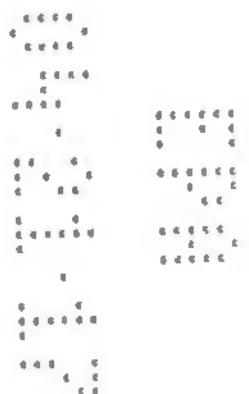
{NOTE TO REVIEWER: All claims in this section are optional}

- Mosquito repellent
- Blackfly repellent
- Repels mosquitoes
- Repels blackflies
- Effective protection from mosquitoes, blackflies
- Effectively repels mosquitoes and blackflies
- (Effective) protection (from a range of mosquitoes and blackflies)
- Repels mosquitoes that may carry (West Nile Virus) (and) (Eastern Equine Encephalitis)
- Works great on blackflies
- Protection (from bites) from blackflies (for the whole family)
- Protection for people on the go
- Protection that fits your lifestyle
- Protects from mosquitoes (and) (blackflies) (for up to 7 hours)
- Apply every 6 hours (or as needed)
- Repels mosquitoes and blackflies (for up to 7 hours)
- (Smart) Outdoor protection (from annoying) (mosquitoes) (and) (blackflies) (for up to 7 hours)
- Repels flies (too!)
- Keeps (mosquitoes) (and) (blackflies) off (your family)
- Guards the whole family (safely)
- Protection that fits your (active) lifestyle
- Protect(s) your family at dusk and dawn
- An effective insect repellent
- Protection during outdoor activities
- (Sport) (Active) (Outdoor) formula
- Outdoor mosquito and blackfly protection for play and on the go
- For yardwork and camping
- Protects during work, play or recreation
- Contains (a) plant-based repellent
- Plant based repellent that repels (mosquitoes) (and) (blackflies) (for) (up to 7 hours)
- Contains plant extracts
- Contains the insect repellent found in (catmint) (catnip) (oil)
- (Plant based) (insect repellent without trade offs)
- Always carry (product name)
- For playing and relaxing outdoors
- Not oily, greasy or sticky
- No added fragrance
- Contains no dyes (or added fragrances)
- No chemical odor
- No synthetic odor
- No unpleasant odor
- Leaves pleasant feeling on skin



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- Won't stain
- (Readily) (Easily) washed off
- Won't harm plastics
- Specially formulated to (feel) (and) (smell) better on your skin
- (light) (gentle) (clean) (mild) (smooth) (non-greasy) (pleasant) (feels great) (comfortable) formula
- No residue on skin
- (It's) pleasant smelling
- Feels comfortable (to touch)
- DEET free
- Non DEET
- Non synthetic
- Readily washed off
- New!
- Repels (mosquitoes) (and) (blackflies)
- Repels mosquitoes that may carry (West Nile) (St. Louis) (Eastern equine) (Western equine) (LaCrosse) (Cache Valley) encephalitis (for up to 7 hours)
- Provides protection from mosquitoes
- Up to 7 hour mosquito and blackfly repellent
- Up to 7 hour protection
- Up to 7 hours of (effective) mosquito (and) (blackfly) protection
- Up to 7 hours of protection from mosquitoes. (Also) (protects against) (works on) (repels) (blackflies)
- Protects for up to 7 hours against (mosquitoes) (and) (blackflies)
- (Protects against) (Fights off) (Repels) (Works on) (mosquitoes) (and) (blackflies)
- Protects against mosquitoes (and) (blackflies)
- Long-lasting protection against (mosquitoes) (and) (blackflies)
- Effective protection from mosquitoes
- Effective protection from blackflies
- Stay protected for up to 7 hours (from) (mosquitoes) (and) (blackflies)
- Stay protected for up to 7 hours from mosquitoes that may carry (West Nile Virus) (St. Louis) (Eastern equine) (Western equine) (LaCrosse) (Cache Valley) encephalitis
- Proven protection from mosquitoes
- Up to 7 hour insect repellent
- Up to 7 hour protection
- (Up to) 7 hours of (effective) mosquito protection
- (Up to) 7 hours of protection from mosquitoes. Also (protects against) (works on) (repels) (blackflies)
- Protects for (up to) 7 hours against (mosquitoes)(,) (and) (blackflies)
- (Protects against) (Fights off) (Repels) (Works on) (mosquitoes)(,) (and) (blackflies)
- Protects against mosquitoes and (blackflies)
- Long-lasting protection against (mosquitoes)(,) (and) (blackflies)



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- Effective protection from mosquitoes
- Effective protection from blackflies
- Stay protected for up to 7 hours (from) (mosquitoes)(,) (and) (blackflies)
- Stay protected for up to 7 hours from mosquitoes that may carry (West Nile) (St. Louis) (Eastern equine) (Western equine) (LaCrosse) (Cache Valley) encephalitis
- Proven protection from mosquitoes
- Mosquito protection (for up to 7 hours)
- Biting (mosquito) (and) (blackfly) protection that you can feel confident will last up to 7 hours.
- Repels mosquitoes (for up to 7 hours)
- Repels blackflies (for up to 7 hours)
- Easy to (Use) (Apply)
- For (hiking) (fishing) (hunting) (camping) (backpacking)
- Relax and enjoy the (outdoors)(,) (the great outdoors)(,) (backyard)(,) (outside)(,) (park)(,) (woods/forest) with up to 7 hours of protection against (mosquitoes) (and) (blackflies)
- Portable repellent protection
- Comfortable feel with no chemical (odor)(smell)
- Comfortable feel with pleasant smell
- Long-lasting
- Contains Refined Oil of *Nepeta cataria*
- Essential oil based repellent, not a synthetic chemical.
- Plant based essential oil insect repellent.
- Essential oil insect repellent with up to 7 hours of effective protection (against) (mosquitoes) (and) (blackflies)
- Insect repellent with up to 7 hours of effective protection (against mosquitoes) and (blackflies)
- An essential oil repellent that protects against mosquitoes that may carry West Nile Virus
- Repels mosquitoes that may carry West Nile Virus and Encephalitis
- Effective mosquito repellent
- Repels mosquitoes for up to 7 hours, which may carry West Nile Virus and Encephalitis
- Plant based, essential oil that repels mosquitoes for up to 7 hours
- A plant based insect repellent with up to 7 hours of effective protection
- Good for people
- Protects people
- Produced from a renewable resource

(LIMITATION OF WARRANTY AND LIABILITY)

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Entomol 15% Liquid
(Insect repellent)(Liquid)
(Repels Mosquitoes and Blackflies)
(Insect Repellent Pump-Spray)

ACTIVE INGREDIENT:

Refined Oil of *Nepeta cataria* 15.0%

OTHER INGREDIENTS 85.0%

TOTAL: **100.0%**

KEEP OUT OF REACH OF CHILDREN

WARNING

(See (Back) (or) (Side) (Label Panel(s)) (Product Leaflet) for Additional
Precautionary Statements)

FIRST AID	
If in Eyes:	<ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after 5 minutes, then continue rinsing eye.• Call a Poison Control Center or doctor for further treatment advice.
If swallowed:	<ul style="list-style-type: none">• Call Poison Control Center or doctor immediately for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by the poison control center or doctor.• Do not give anything by mouth to an unconscious person.
HOTLINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For emergency information on this pesticide product (including health concerns, medical emergencies, or pesticide incidents), call the poison control center at 1-800-222-1222. For non-emergency information concerning this product, call the National Pesticides Information Center (NPIC) at 1-800-858-7378 (NPIC Web site: www.npic.orst.edu)	

EPA Reg. No. 91889-NEW
EPA Est. No. XXXXX-YY-ZZZ

NET CONTENTS:
BATCH NO.:

Manufactured By:
Entomol Products, LLC
40 Gold Street
San Francisco, CA 94133

Label Version: 4/21/2017

Page 1 of 6

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PRECAUTIONARY STATEMENTS

HAZARD TO HUMANS AND DOMESTIC ANIMALS. WARNING. Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

PHYSICAL AND CHEMICAL HAZARDS

FLAMMABLE: Keep away from Heat and Open Flame.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Repellency – Repels mosquitoes and blackflies for up to 7 hours.

Do not allow children to handle the product or apply it to themselves. If used on the face, spray/dispense on hands first and then apply sparingly and avoid eyes. Do not spray directly onto face.

Dispense/Spray apply a small amount of liquid directly onto skin. Spread uniformly to completely cover any exposed skin surface. Use sparingly on face and avoid contact with eyes. Reapply after 4-6 hours (or as needed).

When applying to children, dispense into an adult's hand and then spread evenly and completely over the child's exposed skin taking care not to contact the child's fingers and hands. Do not apply over cuts or damaged skin. When applying to children, dispense into an adults hand and then spread evenly and completely over the child's exposed skin taking care not to contact the child's fingers and hands.

Do not apply over cuts or damaged skin. After returning indoors, wash treated skin with soap and water or bathe. Also wash clothing before wearing it again.

STORAGE AND DISPOSAL

Do not contaminate water or food by storage or disposal.

PESTICIDE STORAGE: Store away from children.

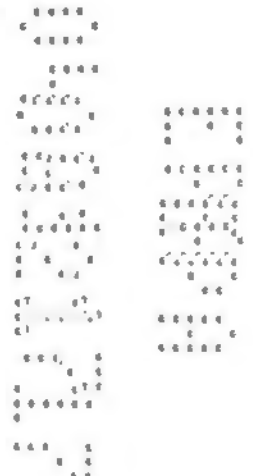
PESTICIDE DISPOSAL: Do not contaminate water, food or feed by storage or disposal. Never place unused product down any indoor or outdoor drain.

CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. If empty: Offer for recycling if available or discard in a sanitary landfill. If partly filled: Call your local solid waste agency for disposal instructions.

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{NOTE TO REVIEWER: All claims in this section are optional}

- Mosquito repellent
- Blackfly repellent
- Repels mosquitoes
- Repels blackflies
- Effective protection from mosquitoes, blackflies
- Effectively repels mosquitoes and blackflies
- (Effective) protection (from a range of mosquitoes and blackflies)
- Repels mosquitoes that may carry (West Nile Virus) (and) (Eastern Equine Encephalitis)
- Works great on blackflies
- Protection (from bites) from blackflies (for the whole family)
- Protection for people on the go
- Protection that fits your lifestyle
- Protects from mosquitoes (and) (blackflies) (for up to 7 hours)
- Apply every 6 hours (or as needed)
- Repels mosquitoes and blackflies (for up to 7 hours)
- (Smart) Outdoor protection (from annoying) (mosquitoes) (and) (blackflies) (for up to 7 hours)
- Repels flies (too!)
- Keeps (mosquitoes) (and) (blackflies) off (your family)
- Guards the whole family (safely)
- Protection that fits your (active) lifestyle
- Protect(s) your family at dusk and dawn
- An effective insect repellent
- Protection during outdoor activities
- (Sport) (Active) (Outdoor) formula
- Outdoor mosquito and blackfly protection for play and on the go
- For yardwork and camping
- Protects during work, play or recreation
- Contains (a) plant-based repellent
- Plant based repellent that repels (mosquitoes) (and) (blackflies) (for) (up to 7 hours)
- Contains plant extracts
- Contains the insect repellent found in (catmint) (catnip) (oil)
- (Plant based) (insect repellent without trade offs)
- Always carry (product name)
- For playing and relaxing outdoors
- Not oily, greasy or sticky
- No added fragrance
- Contains no dyes (or added fragrances)
- No chemical odor
- No synthetic odor
- No unpleasant odor
- Leaves pleasant feeling on skin



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- Won't stain
- (Readily) (Easily) washed off
- Won't harm plastics
- Specially formulated to (feel) (and) (smell) better on your skin
- (light) (gentle) (clean) (mild) (smooth) (non-greasy) (pleasant) (feels great) (comfortable) formula
- No residue on skin
- (It's) pleasant smelling
- Feels comfortable (to touch)
- DEET free
- Non DEET
- Non synthetic
- Readily washed off
- New!
- Repels (mosquitoes) (and) (blackflies)
- Repels mosquitoes that may carry (West Nile) (St. Louis) (Eastern equine) (Western equine) (LaCrosse) (Cache Valley) encephalitis (for up to 7 hours)
- Provides protection from mosquitoes
- Up to 7 hour mosquito and blackfly repellent
- Up to 7 hour protection
- Up to 7 hours of (effective) mosquito (and) (blackfly) protection
- Up to 7 hours of protection from mosquitoes. (Also) (protects against) (works on) (repels) (blackflies)
- Protects for up to 7 hours against (mosquitoes) (and blackflies)
- (Protects against) (Fights off) (Repels) (Works on) (mosquitoes) (and) (blackflies)
- Protects against mosquitoes (and) (blackflies)
- Long-lasting protection against (mosquitoes) (and blackflies)
- Effective protection from mosquitoes
- Effective protection from blackflies
- Stay protected for up to 7 hours (from) (mosquitoes) (and) (blackflies)
- Stay protected for up to 7 hours from mosquitoes that may carry (West Nile Virus) (St. Louis) (Eastern equine) (Western equine) (LaCrosse) (Cache Valley) encephalitis
- Proven protection from mosquitoes
- Up to 7 hour insect repellent
- Up to 7 hour protection
- (Up to) 7 hours of (effective) mosquito protection
- (Up to) 7 hours of protection from mosquitoes. Also (protects against) (works on) (repels) (blackflies)
- Protects for (up to) 7 hours against (mosquitoes)(,) (and) (blackflies)
- (Protects against) (Fights off) (Repels) (Works on) (mosquitoes)(,) (and) (blackflies)
- Protects against mosquitoes and (blackflies)
- Long-lasting protection against (mosquitoes)(,) (and) (blackflies)

- () – Denotes optional label language
 { } – Denotes a comment for the reviewer

- Effective protection from mosquitoes
- Effective protection from blackflies
- Stay protected for up to 7 hours (from) (mosquitoes)(,) (and) (blackflies)
- Stay protected for up to 7 hours from mosquitoes that may carry (West Nile) (St. Louis) (Eastern equine) (Western equine) (LaCrosse) (Cache Valley) encephalitis
- Proven protection from mosquitoes
- Mosquito protection (for up to 7 hours)
- Biting (mosquito) (and) (blackfly) protection that you can feel confident will last up to 7 hours.
- Repels mosquitoes (for up to 7 hours)
- Repels blackflies (for up to 7 hours)
- Easy to (Use) (Apply)
- For (hiking) (fishing) (hunting) (camping) (backpacking)
- Relax and enjoy the (outdoors)(,) (the great outdoors)(,) (backyard)(,) (outside)(,) (park)(,) (woods/forest) with up to 7 hours of protection against (mosquitoes) (and) (blackflies)
- Portable repellent protection
- Comfortable feel with no chemical (odor)(smell)
- Comfortable feel with pleasant smell
- Long-lasting
- Contains Refined Oil of *Nepeta cataria*
- Essential oil based repellent, not a synthetic chemical.
- Plant based essential oil insect repellent.
- Essential oil insect repellent with up to 7 hours of effective protection (against) (mosquitoes) (and) (blackflies)
- Insect repellent with up to 7 hours of effective protection (against mosquitoes) and (blackflies)
- An essential oil repellent that protects against mosquitoes that may carry West Nile Virus
- Repels mosquitoes that may carry West Nile Virus and Encephalitis
- Effective mosquito repellent
- Repels mosquitoes for up to 7 hours, which may carry West Nile Virus and Encephalitis
- Plant based, essential oil that repels mosquitoes for up to 7 hours
- A plant based insect repellent with up to 7 hours of effective protection
- Good for people
- Protects people
- Produced from a renewable resource

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